

# EXHIBIT A

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

<b>ONE STOCKDUQ HOLDINGS, LLC,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>No. 2:12-cv-03037-JPM-tmp</b>
	)	
<b>BECTON, DICKINSON AND COMPANY,</b>	)	<b>JURY TRIAL DEMANDED</b>
	)	
<b>Defendant.</b>	)	
	)	

**ONE STOCKDUQ HOLDINGS, LLC’S FINAL CONSTRUCTIONS  
OF THE CLAIM TERMS IN DISPUTE**

Pursuant to Local Patent Rule 4.5(b), One StockDuq Holdings, LLC (“One-SD”) hereby provides its Constructions of the Claim Terms in Dispute and Supporting Evidence.

<b>Claim</b>	<b>Term</b>	<b>One-SD's Proposed Construction</b>	<b>Supporting Evidence</b>
22, 31	"needle attachment body"	"housing that shields the tip of the needle when the needle is in the retracted storage position"	Abstract; Figures 1-4,6-12; 1:45-50; 2:16-21; 4:6-11; 6:44-47; 8:21-26; Exhibit A, Webster's Third New International Dictionary, Unabridged, "housing"
22, 31	"connected to said hub"	"joined or linked to the hub"	Abstract; Figures 1-12; Exhibit A, Webster's Third New International Dictionary, Unabridged, "connected"
22	"flexible resilient diaphragm...for preventing the flow of a liquid"	"pliable membrane, capable of returning to its shape after deformation, which is directly or indirectly attached to the hub partition the hub passageway between the side access port and the needle attachment body to prevent liquid that is flowing through the hub passageway and past the side access port from exiting the proximal end of the hub except through the needle passageway"	Abstract; Figures 3-5; 2:38-44; 4:24-54; 6:67-7:4; 8:10-16; 11:66-67; Exhibit A, Webster's Third New International Dictionary, Unabridged, "flexible"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "resilient"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "diaphragm"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "lumen"
22	"diaphragm attached between said body and a proximal end of said hub"	"membrane that is directly or indirectly attached to the hub to partition the hub passageway between the side access port and the needle attachment body"	Abstract; Figures 3-5; 2:38-44; 4:24-54; 6:67-7:4; 8:10-16; 11:66-67; Exhibit A, Webster's Third New International Dictionary, Unabridged, "flexible"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "resilient"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "diaphragm"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "lumen"

Claim	Term	One-SD's Proposed Construction	Supporting Evidence
22	"flexible resilient diaphragm attached between said body and a proximal end of said hub proximal to said side access port for preventing the flow of a liquid through said hub lumen past said side access port and through the proximal end of said hub external to said introducer needle cannula"	"pliable membrane, capable of returning to its shape after deformation, which is directly or indirectly attached to the hub to partition the hub passageway between the side access port and the needle attachment body to prevent liquid that is flowing through the hub passageway and past the side access port from exiting the proximal end of the hub except through the needle passageway"	Abstract; Figures 3-5; 2:38-44; 4:24-54; 6:67-7:4; 8:10-16; 11:66-67; Exhibit A, Webster's Third New International Dictionary, Unabridged, "flexible"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "resilient"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "diaphragm"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "lumen"
22	"at least one fenestration on a central portion thereof which communicates with a cannula of said introducer needle and...with said hub lumen"	"at least one opening located between the ends of the needle that, when the needle is in the operative position, permits liquid flow from the needle passageway into the catheter passageway, whether or not the fenestration is disposed within the hub passageway when the needle is in the operative position"	Abstract; Figures 3,4,6; 2:53-57; 4:2-4; 5:34-40; 7:5-14; 7:58-63; 8:37-41; 11:61-63; May 12, 1997 Office Action at p. 2; June 2, 1997 Interview Summary; Exhibit A, Webster's Third New International Dictionary, Unabridged, "fenestration"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "communicate"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "lumen"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "central"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "portion"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "center"

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22	"at least one fenestration on a central portion thereof which communicates with a cannula of said introducer needle and, when said introducer needle is in said operative position, with said hub lumen"	"at least one opening located between the ends of the needle that, when the needle is in the operative position, permits liquid flow from the needle passageway into the catheter passageway, whether or not the fenestration is disposed within the hub passageway when the needle is in the operative position"	Abstract; Figures 3,4,6; 2:53-57; 4:2-4; 5:34-40; 7:5-14; 7:58-63; 8:37-41; 11:61-63; May 12, 1997 Office Action at p. 2; June 2, 1997 Interview Summary; Exhibit A, Webster's Third New International Dictionary, Unabridged, "fenestration"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "communicate"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "lumen"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "central"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "portion"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "center"
31	"diaphragm being attached to said hub to seal a proximal end of said hub lumen in a liquid tight manner"	"membrane that is indirectly or directly attached to the hub to partition the hub passageway to prevent liquid from exiting the proximal end of the hub except through the needle passageway, if a needle is penetrating the membrane"	Abstract; Figures 3-5; 2:38-44; 4:24-54; 6:67-7:4; 8:10-16; 11:66-67; Exhibit A, Webster's Third New International Dictionary, Unabridged, "flexible"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "resilient"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "diaphragm"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "lumen"
31	"flexible, resilient diaphragm...for preventing a liquid...from flowing through said diaphragm beyond said hub"	"a pliable membrane, capable of being penetrated by a needle and returning to its shape after deformation, which is indirectly or directly attached to the hub to partition the hub passageway to prevent liquid from exiting the proximal end of the hub except through the needle passageway, if a needle is penetrating the membrane"	Abstract; Figures 3-5; 2:38-44; 4:24-54; 6:67-7:4; 8:10-16; 11:66-67; Exhibit A, Webster's Third New International Dictionary, Unabridged, "flexible"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "resilient"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "diaphragm"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "lumen"

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31	"a liquid which has been introduced into said hub lumen from said catheter, external to a needle which may be penetrating said diaphragm and projecting into said hub lumen"	"a liquid inside the hub passageway but outside the needle passageway if a needle is penetrating the membrane"	Abstract; Figures 3,9; 2:38-44; 4:25-54; 6:67-7:4; 8:10-16; 11:66-67; Exhibit A, Webster's Third New International Dictionary, Unabridged, "flexible"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "resilient"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "diaphragm"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "lumen"
31	"flexible, resilient diaphragm which can be penetrated by a hypodermic needle, such as a catheter introducer needle, said diaphragm being attached to said hub to seal a proximal end of said hub lumen in a liquid tight manner for preventing a liquid which has been introduced into said hub lumen from said catheter, external to a needle which may be penetrating said diaphragm and projecting into said hub lumen, from flowing through said diaphragm beyond said hub"	"a pliable membrane, capable of being penetrated by a needle and returning to its shape after deformation, which is indirectly or directly attached to the hub to partition the hub passageway to prevent liquid from exiting the proximal end of the hub except through the needle passageway, if a needle is penetrating the membrane"	Abstract; Figures 3-5; 2:38-44; 4:24-54; 6:67-7:4; 8:10-16; 11:66-67; Exhibit A, Webster's Third New International Dictionary, Unabridged, "flexible"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "resilient"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "diaphragm"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "lumen"

Claim	Term	One-SD's Proposed Construction	Supporting Evidence
31	"at least one fenestration on a central portion thereof which communicates with a cannula of said introducer needle and with said hub lumen"	"at least one opening located between the ends of the needle that, when the needle is in the operative position, permits liquid flow from the needle passageway into the catheter passageway, whether or not the fenestration is disposed within the hub passageway when the needle is in the operative position"	Abstract; Figures 3,4,6; 2:53-57; 4:2-4; 5:34-40; 7:5-14; 7:58-63; 8:37-41; 11:61-63; May 12, 1997 Office Action at p. 2; June 2, 1997 Interview Summary; Exhibit A, Webster's Third New International Dictionary, Unabridged, "fenestration"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "communicate"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "lumen"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "central"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "portion"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "center"
31	"at least one fenestration on a central portion thereof which communicates with a cannula of said introducer needle and with said hub lumen and which is positioned distally of said diaphragm when said introducer needle is disposed in said operative position"	"at least one opening located between the ends of the needle that, when the needle is in the operative position, permits liquid flow from the needle passageway into the catheter passageway, whether or not the fenestration is disposed within the hub passageway when the needle is in the operative position"	Abstract; Figures 3,4,6; 2:53-57; 4:2-4; 5:34-40; 7:5-14; 7:58-63; 8:37-41; 11:61-63; May 12, 1997 Office Action at p. 2; June 2, 1997 Interview Summary; Exhibit A, Webster's Third New International Dictionary, Unabridged, "fenestration"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "communicate"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "lumen"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "central"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "portion"; Exhibit A, Webster's Third New International Dictionary, Unabridged, "center"